

NRCREP Resource

From: Raymond.A.West@dom.com
Sent: Friday, May 29, 2009 1:25 PM
To: NRCREP Resource
Cc: Wallace Norris
Subject: Public Comment on Draft Guide DG-1192 - Requesting Code Case N-513-3 be Approved for Use
Attachments: Code Case N-513-3 Public Comment.pdf

Dear Sir or Madam:

Attached is my comment letter on DG-1192.

(See attached file: Code Case N-513-3 Public Comment.pdf)

Ray West

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SONSI Review complete
Template = ADM-013

E-REDS = ADM-03
Call = M. Bayssie (MUB1)
W. Norris (WEN)

May 29, 2009

Attn: Rulemaking, Directives, and Editing Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Nrcprep.resource@nrc.gov

Subject: Public Comment on Draft Regulatory Guide DG-1192 – Request for Inclusion of ASME Code Case N-513-3 - (Proposed Revision 16 of Regulatory Guide 1.147, dated October 2007)

Dear Sir or Madam:

This is a public comment submitted on my own behalf as a concerned citizen. Although, I work for a nuclear utility and I am a member of ASME this comment is strictly being submitted as my own opinion and may not necessarily reflect the opinion of ASME or my company.

Table 1 of the current Regulatory Guide 1.147 Rev. 15 and the Proposed Draft Guide DG-1192, titled; *“Table 1. Acceptable Section XI Code Cases,”* lists Code Case Number N-513-2, “Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping, Section XI, Division 1, date of Supplement/Edition 2/20/04. Thus, this Code Case is fully acceptable to the staff with no conditions required for its use.

Recently, in October 2008, 10 CFR 50.55a was changed to require the use of the 2004 Edition of Section XI as the latest approved and mandated version of Section XI in 10 CFR 50.55a(b). Within the 2004 Edition of Section XI, the following requirement exists:

“IWA-2441(b) Code Cases shall be applicable to the Edition and Addenda specified in the Inspection Plan.”

For Licensees that have updated their ISI plans to meet the 2004 Edition of Section XI, they are no longer allowed to use Code Case N-513-2. The Code applicability for Code Case N-513-2 is limited to the 2003 Addenda of Section XI.

To resolve this issue ASME has just recently published Code Case N-513-3 in Supplement 8 of the ASME Nuclear Code Cases Book and this revision now includes applicability up to the 2008 Addenda of Section XI alleviating the applicability issue from the ASME perspective.

However, because Code Case N-513-3 was just recently published by ASME it was not included in the proposed Draft Guide DG-1192. This letter is a request to expedite the approval of Code Case N-513-3 into DG-1192 and ultimately into Reg. Guide 1.147 Rev. 16.

The first reason to allow this expedited approval of Code Case N-513-3 is to resolve the administrative applicability issue described above. The Code Case regardless of its revision has been proven to be a very valuable tool for the nuclear industry and the NRC

in allowing flaws to be evaluated without plant specific and item specific relief requests being required. Use of this Code Case is an example of providing an acceptable alternative, while reducing burden on both the industry and the NRC, and at the same time maintaining an acceptable level of quality and safety as required under 10 CFR 50.55a(a)(3)(i). Additionally, in support of how valuable this Code Case is it currently included in the Regulatory Issue Summary (RIS) 2005-20, Rev. 1, "Revision to NRC Inspection Manual Part 9900 Technical Guidance, "Operability determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality and Safety." The reference in this RIS allows the use of the original version of Code Case N-513 and future revisions of this Case as they are approved for use in Reg. Guide 1.147.

Secondly, not only was there an effort to increase the applicability of Code Case N-513-2 with its revision to N-513-3, but it was also revised to clear up some ambiguity in Code Case N-513-2. The documented statement for the revision of Code Case N-513-2 within ASME said, in part, it included:

"The proposed revision to Code Case N-513-2 provides significant clarifications for the user regarding the evaluation of through-wall, nonplanar flaws which is the flaw type most commonly dispositioned by the Code Case. Currently, no guidance is provided for nonplanar flaw combination and the two approaches for the evaluation of through-wall, nonplanar flaws (branch reinforcement and planar characterization) are not entirely clear. More specifically, the current branch reinforcement evaluation approach (based on ASME Section III Class 2 and 3 rules) provides an ambiguous acceptability criterion. The proposed revision to Code Case N-513-2 resolves this issue by specifying the required area of reinforcement be calculated in accordance with Class 1 rules (acceptance criteria provided in new equation in revision). Also, the depth at which a through-wall, nonplanar flaw is characterized for planar evaluation in both the axial and circumferential directions is made less restrictive in the proposed revision to account for NDE inspection capabilities."

In light of the reasons explained above it is requested with this comment that Code Case N-513-3 be included in DG-1192 and ultimately approved in the latest revision of Reg. Guide 1.147, Rev. 16. If you have any questions about this comment letter please do not hesitate to contact me at (860) 447-1791 Ext. 2282 or by e-mail at Raymond.A.West@dom.com.

Sincerely Yours,



Raymond (Ray) A. West

cc: W.E Norris, USNRC Research Wallace.Norris@nrc.gov